

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

GERTRUDE MAE FLYNN, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

AIMBRIDGE HOSPITALITY, LLC,

Defendant.

Case No. 2:17-cv-01649-JFC

Judge Joy Flowers Conti

UNOPPOSED MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS

Plaintiff Gertrude Mae Flynn, by and through her undersigned counsel, respectfully moves this Court for approval of reasonable attorneys' fees and costs pursuant to the proposed Class Action Settlement that this Court preliminarily approved in its Order dated December 21, 2018 ("Preliminary Approval Order") (Dkt. No. 33).¹ The total amount Plaintiff requests for approval of all fees and costs in this litigation is \$128,500.00. Plaintiff is entitled to reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 12205. Defendant does not oppose this motion.

Attached to this Motion as Exhibit 1 is the Declaration of R. Bruce Carlson.

WHEREFORE, for the reasons set forth in the supporting brief filed herewith, Plaintiff respectfully requests that the Court enter the attached Proposed Order directing Defendant to pay attorneys' fees and costs to class counsel consistent with the terms of the Class Action Settlement.

¹ The Settlement Agreement was attached as Exhibit 1 to the Unopposed Motion for Preliminary Approval of Class Action Settlement ("Preliminary Approval Motion") (Dkt. No. 29-1).

Dated: March 29, 2019

Respectfully submitted,

/s/ Kelly K. Iverson

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on March 29, 2019, a true and correct copy of UNOPPOSED MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS was served upon all counsel of record via the Court's electronic filing system.

/s/ Kelly K. Iverson